

**From:** Man Voong  
**To:** Kangshi Wang  
**CC:** Jenny Newman  
**Date:** 5/8/2012 8:53 AM  
**Subject:** Fwd: Re: Comment Letter – Bacteria TMDLs Revisions

>>> LB Nye 5/7/2012 1:20 PM >>>

>>> losangeles 5/7/2012 1:13 PM >>>  
FYI- for quicker review, did not upload to ECM.

>>> Carol Moss <greenlotus@earthlink.net> 5/7/2012 12:25 PM >>>

The TMDLs for Malibu Lagoon need to be updated to conform to recent major scientific studies (a Total Maximum Daily Load, or TMDL, is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards). These studies confirm broad sources of natural and human pollution that were not considered previously, because, until now, there was no science to support these findings. In 2011 the USGS (United States Geological Survey) found that there was no fecal human bacteria in Malibu Lagoon. Instead there exists a very high bacterial load coming from bird droppings and other sources as yet to be clarified. NOAA (National Oceanic and Atmospheric Administration) recently established a high level of staph (*Staphylococcus aureus*) in the sand at surfrider beach coming from the skin of beachgoers. This includes very dangerous MRSA (anti-biotic resistant bacteria) and highlights another source of pollution. Science is continually bringing us new revelations and we must move with it. The current definition of natural and human pollution does not yet embrace new science and by keeping wording narrow, environmental groups have standing to sue small cash-strapped communities and are doing so.

Please also consider having people making public comment at your hearings identify their group affiliations. At a recent hearing staff members of interested groups testified as concerned beachgoers, not revealing their professional interest in the outcome of the hearing.

Thank you so much, and thank you to for all your hard work on behalf of us all.

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